

1 MARK J. BOURASSA, ESQ. (NBN 7999)
2 JENNIFER A. FORNETTI, ESQ. (NBN 7644)
3 VALERIE S. CHRISTIAN ESQ. (NBN 14716)
4 **THE BOURASSA LAW GROUP**
5 2350 W. Charleston Blvd., Suite 100
6 Las Vegas, Nevada 89102
7 Telephone: (702) 851-2180
8 mbourassa@blgwins.com
9 jfornetti@blgwins.com
10 vgray@blgwins.com

11 *Attorneys for Plaintiff and the Proposed Class*
12 [Additional counsel on signature page]

13 Todd L. Bice (NBN 4534)
14 **PISANELLI BICE PLLC**
15 400 S. 7th Street Suite 300
16 Las Vegas, NV 89101
17 Telephone: 702.214.2100
18 tlb@pisanellibice.com

19 Angela C. Agrusa (CA State Bar No 131337)*
20 **DLA PIPER LLP (US)**
21 2000 Avenue of the Stars
22 Suite 400 North Tower
23 Los Angeles, CA 90067-4735
24 Telephone: 310.595.3000
25 angela.agrusa@us.dlapiper.com

16 **Pro hac vice application forthcoming*

17 *Attorneys for Defendant*
18 *MGM Resorts International*

19
20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 CHARLES BEZAK, individually and on behalf
23 of all others similarly situated

24 Case No. 2:23-cv-01719-RFB-BNW

25 **STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

26 Plaintiff,

27 v.

28 MGM RESORTS INTERNATIONAL,

29 Defendant.

30 Pursuant to LR IA 6-1, Plaintiff Charles Bezak and Defendant MGM Resorts
31 International ("MGM") (collectively, the "Parties") respectfully stipulate MGM's time to
32 respond to the Complaint be extended from the current deadline of November 24, 2023 to

33 STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT
34 CASE NO. NO. 2:23-CV-01719

1 and including December 12, 2023. This is the first stipulation for an extension of time to file
 2 MGM's responsive pleading.

3 Good cause exists to enlarge the time for MGM to respond to the Complaint.
 4 Between September 21 and November 8, 2023, eleven other related actions were filed
 5 against MGM in this and two other federal courts (the "Related Actions"). *See Owens v.*
 6 *MGM Resorts Int'l*, No. 2:23-cv-01480 (D. Nev.); *Kirwan v. MGM Resorts Int'l*, No. 2:23-
 7 cv-01481 (D. Nev.); *Zussman v. VICI Properties 1 LLC, et al.*, No. 2:23-cv-01537 (D. Nev.);
 8 *Lackey v. MGM Resorts Int'l*, No. 2:23-cv-01549 (D. Nev.); *Pircio v. MGM Resorts Int'l*,
 9 No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int'l*, No. 2:23-cv-01577 (D. Nev.);
 10 *Rundell v. MGM Resorts Int'l*, No. 2:23-cv-01698 (D. Nev.); *Zari v. MGM Resorts Int'l*, No.
 11 2:23-cv-01777 (D. Nev.); *Manson v. MGM Resorts Int'l*, No. 2:23-cv-01826 (D. Nev.);
 12 *Albrigo v. MGM Resorts Int'l*, No. 3:23-cv-01797 (S.D. Cal.); *Lassoff v. MGM Resorts Int'l*,
 13 *et al.*, No. 1:23-cv-20419 (D.N.J.).

14 MGM's counsel was only recently retained and requires additional time to review,
 15 investigate, and analyze the allegations in both the Complaint and the Related Actions.
 16 Moreover, based on the Parties' current understanding of the claims, there are significant
 17 overlaps between this action and the Related Actions. As such, additional time is required to
 18 permit time to meet and confer with the various parties to the Related Actions, evaluate the
 19 potential consolidation of the cases, and conserve judicial resources.

20 The Parties' request is made in good faith to enable MGM to complete an
 21 investigation into Plaintiff's claims. Moreover, this case is in its infancy, and this request
 22 will not prejudice any party.

23 A proposed order is attached.

24 ///

25 ///

26 ///

27 ///

28 ///

1 **WHEREAS** the Parties respectfully request that MGM shall have until December
2 12, 2023 to answer, move, or otherwise respond to the Complaint.

3 Dated: November 21, 2023

Respectfully submitted,

4 **THE BOURASSA LAW GROUP**

5 _____
6 /s/ Jennifer A. Fornetti

7 MARK J. BOURASSA
8 JENNIFER A. FORNETTI
9 VALERIE S. CHRISTIAN
10 2350 W. Charleston Blvd., Suite 100
11 Las Vegas, Nevada 89102
12 Telephone: (702) 851-2180
13 mbourassa@blgwins.com
14 jfornetti@blgwins.com
15 vchristian@blgwins.com

16 GARY F. LYNCH (*pro hac vice*)
17 PATRICK D. DONATHEN (*pro hac vice*)
18 **LYNCH CARPENTER LLP**
19 1133 Penn Avenue, 5th Floor
20 Pittsburgh, Pennsylvania 15222
21 Telephone: (412) 322-9243
22 gary@lcllp.com
23 patrick@lcllp.com

24 *Attorneys for Plaintiff and the Proposed
25 Class*

26 _____
27 /s/ Todd L. Bice

28 Todd L. Bice
1 **PISANELLI BICE, PLLC**
2 400 S. 7th Street Suite 300
3 Las Vegas, NV 89101
4 Telephone: 702.214.2100
5 tlb@pisanellibice.com

6 Angela C. Agrusa*
7 **DLA PIPER LLP (US)**
8 2000 Avenue of the Stars
9 Suite 400 North Tower
10 Los Angeles, CA 90067-4735
11 Telephone: 310.595.3000
12 angela.agrusa@us.dlapiper.com

13 **Pro hac vice application forthcoming*

14 *Attorneys for Defendant
15 MGM Resorts International*

